

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 22-CR-20504

vs.

Hon. Jonathan J.C. Grey

AWS MOHAMMED NASER,

Defendant.

/

**MOTION TO EXTEND DEADLINE TO  
COMPLETE CLASSIFIED DISCOVERY AND FOR  
SUBMISSION OF CIPA MOTIONS**

The United States moves to extend the deadline to complete discovery and submit motions under the Classified Information Procedures Act, 18 U.S.C. App. III by three weeks to November 30, 2023, for the reasons stated below and in an accompanying classified brief submitted *ex parte* through the Classified Information Security Officer.

On August 9, 2023, this Court ordered the Government to complete discovery production and submit motions under CIPA by November 6, 2023. The Court also instructed the Government that, if it found it could not

comply with that deadline, to submit motions for an extension by mid-October.

Since that date, the Government has worked diligently to meet the November 6 deadline. However, for the reasons explained in the accompanying classified brief, that has proven to be impossible. The Government needs another three weeks to finish its work.

The Government shares the Defense's desire to move this case along as quickly as possible. However, this case is complex and one of the biggest obstacles to proceeding to trial will be the Court's need to review the classified submissions the Government will be making as part of its CIPA motion as well as in response to the Defense's Motion to Suppress (Doc. 73). Extra time is necessary for the Government to ensure that the process is complete, organized, and as streamlined and as easy as possible for the Court to conduct its review.

If the Government's motion is granted, the Government suggests also postponing the Status Conference currently set for November 13, 2023, to a date in mid-December convenient to the Court. Only after it has received the Government's submissions will the Court be able to evaluate the time it needs and set a trial schedule. Accordingly, a status conference in December

will be more useful to the parties and the Court.

Respectfully submitted,

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Date: October 16, 2023